

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	
	:	
vs.	:	No. 22-cr-352 (JSR)
ANTHONY MCGEE, KAHEE SMALL,	:	
DAMON DORE, RAHMIEK LACEWELL,	:	
ET AL.	:	
Defendants.		

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**NOTICE OF MOTION *IN LIMINE* TO EXCLUDE EVIDENCE OF GANG  
AFFILIATION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and all prior papers and proceedings, Defendants Anthony McGee, Kaheen Small, Damon Dore, and Rahmiek Lacewell (hereinafter, collectively, “the Moving Defendants”) respectfully move this Court before the Honorable Jed S. Rakoff, United States District Judge, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for an order prohibiting the government from introducing any evidence that references or implies that any of the Moving Defendants are affiliated with a gang.

Dated: February 13, 2023

Respectfully submitted,

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